

1 VENABLE LLP
2 Frank C. Cimino, Jr. (*pro hac vice*)
3 FCCimino@venable.com
4 Megan S. Woodworth (*pro hac vice*)
5 MSWoodworth@venable.com
6 Charles J. Monterio, Jr. (*pro hac vice*)
7 CJMonterio@venable.com
8 600 Massachusetts Ave., NW
9 Washington, D.C. 20001
10 Telephone: (202) 344-4000
11 Facsimile: (202) 344-8300

12 William A. Hector (SBN 298490)
13 wahector@venable.com
14 101 California Street, Suite 3800
15 San Francisco, CA 94111
16 Telephone: (415) 653-3750
17 Facsimile: (415) 653-3755

18 *Attorneys for Plaintiff*
19 *Viavi Solutions Inc.*

20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VENABLE LLP
101 CALIFORNIA STREET, SUITE 3800
SAN FRANCISCO, CA 94111
415.653.3750

15 VIAVI SOLUTIONS INC.,

Case No. 5:20-cv-5501-EJD

16 Plaintiff,

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANT TO MOVE, ANSWER, OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

17 v.

18 PLATINUM OPTICS TECHNOLOGY INC.,

19 Defendant.

20 Pursuant to Local Rule 6-3(a) and Fed. R. Civ. P. 4, Plaintiff Viavi Solutions Inc. ("Viavi")
21 moves the Court to extend the time within which Defendant Platinum Optics Technology Inc.
22 ("PTOT") is required to move, answer, or otherwise respond to Plaintiff's Complaint. Viavi filed
23 a Complaint against PTOT on August 7, 2020. Dkt. No. 1. Viavi served PTOT on August 17,
24 2020, and filed its proof of service on August 18, 2020. Dkt. No. 9. The current deadline for
25 PTOT to respond to Viavi's complaint is September 8, 2020. In consideration of Viavi's
26 agreement to a 60-day extension of PTOT's deadline to respond to the complaint, PTOT agrees to
27 waive any objections or challenges to service. Viavi thus agrees that PTOT's deadline to respond
28

1 to Viavi's Complaint is extended to November 9, 2020. The 60-day extension will allow PTOT,
2 a foreign entity, adequate time to coordinate counsel and respond to Viavi's Complaint.

3 There have been no time modifications in this case. The proposed extension will not alter
4 the schedule of the case.

5 Accordingly, Viavi respectfully requests that the time in which PTOT is required to move,
6 answer, or otherwise respond to Viavi's Complaint be extended to and include November 9, 2020.
7

8 Dated: September 4, 2020

VENABLE LLP

9 By: /s/ William A. Hector
10 Frank C. Cimino, Jr. (*pro hac vice*)
FCCimino@venable.com
11 Megan S. Woodworth (*pro hac vice*)
MSWoodworth@venable.com
12 Charles J. Monterio, Jr. (*pro hac vice*)
CJMonterio@venable.com
13 600 Massachusetts Avenue, NW
Washington, D.C. 20001
14 Telephone: (202) 344-4569
Facsimile: (202) 344-8300
15

16 William A. Hector
17 WAHector@venable.com
18 101 California Street, Suite 3800
San Francisco, CA 94111
19 Telephone: (415) 653-3738
Facsimile: (415) 653-3755
20

Attorneys for Plaintiff
Viavi Solutions Inc.

21
22
23
24
25
26
27
28